

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 18-10120
Adam L Williams	:	Chapter 13
	:	Judge Eric L. Frank
Debtor(s)	:	*****
	:	
The Bank of New York Mellon, f/k/a The	:	Date and Time of Hearing
Bank of New York, successor in interest	:	Place of Hearing
to JPMorgan Chase Bank, N.A. as	:	March 20, 2018 at 01:00 p.m.
Trustee for Bear Stearns Asset Backed	:	
Securities Trust 2006-2, Asset-Backed	:	U.S. Bankruptcy Court
Certificates, Series 2006-2	:	900 Market Street, Courtroom #1
	:	Philadelphia, PA, 19107
Movant,	:	
vs	:	
	:	
Adam L Williams	:	
	:	
William C. Miller	:	
Respondents.	:	

MOTION OF THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK, SUCCESSOR IN INTEREST TO JPMORGAN CHASE BANK, N.A. AS TRUSTEE FOR BEAR STEARNS ASSET BACKED SECURITIES TRUST 2006-2, ASSET-BACKED CERTIFICATES, SERIES 2006-2 FOR AN ORDER CONFIRMING THE INAPPLICABILITY OF THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(C)(3)(A)

The Bank of New York Mellon, f/k/a The Bank of New York, successor in interest to JPMorgan Chase Bank, N.A. as Trustee for Bear Stearns Asset Backed Securities Trust 2006-2, Asset-Backed Certificates, Series 2006-2 ("Creditor") by and through undersigned counsel and respectfully moves this Court for an Order confirming that the stay imposed by § 362(a) of the Bankruptcy Code is not in effect in the Current Case (as defined below). In support of this motion, the Movant avers as follows:

1. That on January 8, 2018, Adam L Williams ("Debtor") filed a Chapter 13 bankruptcy case (the "Current Case").

2. That within the preceding year, the following bankruptcy cases, which were filed by or against Debtor (individually, a “Prior Case”), were pending:

Case Number	Date of Dismissal	Basis of Dismissal
16-14395	8/24/17	Dismissed for failure to make plan payments

3. That the Current Case is not a Chapter 11, 12, or 13 that has been re-filed after dismissal of a Prior Case pursuant to § 707(b) of the Bankruptcy Code.
4. Debtor has not elected to extend the §362 Automatic Stay with respect to all creditors pursuant to §362(c)(3)(B).

WHEREFORE, Creditor prays for an Order from the Court confirming that, pursuant to § 362(c)(3)(A) of the Bankruptcy Code, the stay imposed by § 362(a) of the Bankruptcy Code is not in effect in the Current Case.

Respectfully submitted,

/s/ Karina Velter

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